REMARKS/ARGUMENTS

Applicants would like to thank the Examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office action. Favorable reconsideration of the application is requested in view of the remarks and amendments made herein.

Claims 1-6 and 9-13 were rejected under 35 U.S.C. 103(a) as being unpatentable over Watanabe et al. (US 5,625,526) in view of Barnes et al. (US 5,670,066), Ito et al. (US 6,815,646), Zhao et al. (US 5,589,003), and Mulligan et al. (US 6,164,633). Traversal of this rejection is made for at least the following reasons. The combination of Watanabe, Barnes, Ito, Zhao, and Mulligan fail to teach or suggest a *mounting face of an electrode member* divided into:

> a first area, which is located in the center of the mounting face, wherein *a metal, the material used for the electrode member*, is exposed,
> a first insulating area, *the surface of which is covered with an insulating film*, that encloses, like a ring, the outer edge of the first area,
> a second area, wherein *the metal* is exposed, that is extended, like a ring, around the outer edge of the first insulating area, and
> a second insulating area, *the surface of which is covered with an insulating film*, that encloses, like a ring, the outer edge of the second area,

as recited in independent claims 1 and 9. The Examiner concedes that Watanabe does not teach the above limitation and relies on Barnes in an attempt to make up for the deficiencies of Watanabe. Specifically, the Examiner relies on the inner and outer portions of insulating coating 40 as being equivalent to the claimed first and second insulating areas. However, as disclosed in Barnes, insulating coating 40 covers the walls and base of the annular groove formed in block 34. The insulating coating 40 is not an insulating *film* covering a *surface* of the *face* of *a single electrode member*, as required by the present claims. Further, the first electrode 34 and second electrode 38, relied upon by the Examiner, are not first and second areas of the face of the single electrode member, as required by the present claims. In fact, the insulating coating 40 is provided in Barnes so that the first and second electrodes 34, 38 can be at different electric potentials relative to each other and the housing.

The present claims also require that the first and second insulating films are provided at areas designated by outer edges of a small wafer positioned in a center of the mounting face and

a large wafer positioned in a center of the mounting face. The Examiner relies on Mulligan in to show a mounting surface constructed to accommodate at least two different sized wafers. However, there is no motivation to apply the insulating coating of Barnes on outer diameter portions corresponding to the different sized wafers, as required by claims 1 and 9. The Examiner merely states that motivation to provide the insulating coating 40 of Barnes is to be able to control electrical potential at different portions of the substrate support, without stating the motivation for applying an insulating film at the specific designations claimed in independent claims 1 and 9.

In view of the above, Watanabe, Barnes, Ito, Zhao, and Mulligan fail to teach or suggest placing at least two insulating films on a face of an electrode are areas designated by outer diameters of two different sized wafers, as required by claims 1 and 9. Withdrawal of this rejection is respectfully requested.

Claims 7 and 8 were rejected under 35 U.S.C. 103(a) as being unpatentable over Watanabe et al. (US 5,625,526) in view of Barnes et al. (US 5,670,066), Ito et al. (US 6,815,646), Zhao et al. (US 5,589,003), and Mulligan et al. (US 6,164,633) as applied to claims 1-6 and 9-13 above, and further in view of Garabedian et al. (US 2002/0179246) and Sago et al. (US 2003-0198005). Traversal of this rejection is made for at least the following reasons. Claims 7 and 8 depend from claim 1, which is believed to be allowable over the combination of Watanabe, Barnes, Ito, Zhao, and Mulligan for the reasons discussed above. Neither Garabedian nor Sago, alone or in combination, make up for the deficiencies of Watanabe, Barnes, Ito, Zhao, and Mulligan, as neither Garabedian nor Sago disclose placing at least two insulating films on a face of an electrode are areas designated by outer diameters of two different sized wafers. Accordingly the combination of Watanabe, Barnes, Ito, Zhao, Mulligan, Garabedian and Sago do not render claims 7 and 8 obvious. Withdrawal of this rejection is respectfully requested.

In light of the foregoing, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. NGB 39102.

Respectfully submitted,
PEARNE & GORDON LLP

/Una L. Lauricia/
Una L. Lauricia, Reg. No. 48998

1801 East 9th Street
Suite 1200
Cleveland, Ohio 44114-3108
(216) 579-1700
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